

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

CAROLYN DYKES, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

GATESTONE & CO. INTERNATIONAL INC,

Defendant.

Civil Action No.  
1:18-cv-00154 (LO/MSN)

Declaration of Plaintiff Carolyn Dykes in  
Support of Motion for Class Certification

I, Carolyn Dykes, do hereby declare under penalty of perjury, that the  
following is true and correct:

1. I am over the age of 18 years.
2. I am making the following statements based on personal knowledge.
3. I have no known interest that would be adverse to those of the class  
members.
4. After speaking with Attorneys Thomas R. Breeden and Brian L.  
Bromberg, I agreed to be a class representative in a lawsuit not only for myself, but  
also on behalf of a class of all other persons in Virginia who had similar claims  
against the defendant.
5. I am asserting that the defendant, Gatestone & Company  
International, Inc. ("Gatestone"), violated the Fair Debt Collection Practices Act by

sending me a letter in which it required disputes to be made in writing and implied that consumers could not initiate administrative review hearings of student loans resulting from allegedly fraudulent actions of the school attended.

6. A copy of the letter I received is attached as Exhibit A to the Complaint.

7. Upon receipt of the letter, I opened it and read it.

8. The alleged debt was incurred primarily for personal, household and family purposes – that is, for student loans.

9. I am seeking to represent the approximately 212 people who, from February 27, 2017 to August 18, 2018, were sent a letter in a form substantially similar or materially identical to the letter sent to me. A copy of which is attached as Exhibit A to the Complaint.

10. I do not think that it is fair that Gatestone communicated with me and the approximately 212 other people in the manner in which it did.

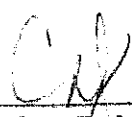
11. I also believe that I should be appointed as class representative.

12. I have been actively involved in this litigation from the time that it commenced, including the decision to bring the case as a class action, and I have remained in contact with the offices of Mr. Breeden and Mr. Bromberg about the status of the case since the time that I authorized the suit.

13. I spoke with Mr. Breeden frequently to help him with the case.

14. As demonstrated by the above, I believe that I can fairly and adequately represent the interests of the members of the class, and I am committed to advancing the class members' rights in this lawsuit.

Dated: October 4, 2018

  
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Carolyn Dykes